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Attorneys for World Distribution Services LLC

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

BED BATH & BEYOND, INC., *et al.*

Debtors.

Michael Goldberg, as Plan Administrator for
20230930-DK-Butterfly-1, Inc. (f/k/a Bed Bath &
Beyond,
Plaintiff,

v.

World Distribution Services LLC

Defendant.

Case No. 23-13359 (VFP)

(Jointly Administered)

Chapter 11

Adv. Case No. 24-01367

**NOTICE OF MOTION OF WORLD DISTRIBUTION SERVICES LLC FOR *PRO HAC*
VICE ADMISSION OF THOMAS R. FAWKES, ESQ.**

World Distribution Services LLC, by and through its undersigned counsel, respectfully moves this Court pursuant to D.N.J. LBR 9010-1 and D.N.J. L. Civ. R. 101.1(c) for the admission *pro hac vice* of Thomas R. Fawkes, Esq., in this matter.

In support of this Motion, World Distribution Services LLC relies upon the accompanying Certifications of Thomas R. Fawkes and Maha M. Kabbash. A proposed form of Order is submitted herewith.

WHEREFORE, World Distribution Services LLC respectfully requests that this Court specially admit Thomas R. Fawkes, Esq. *pro hac vice* on his behalf in this matter.

Respectfully submitted,

TUCKER ELLIS LLP

Dated: May 21, 2025

s/ Maha M. Kabbash

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CERTIFICATE OF SERVICE

I hereby certify that, on May 21, 2025, a true and correct copy of World Distribution Services LLC's Motion for *Pro Hac Vice* Admission of Thomas R. Fawkes, Esq., was electronically filed and was served via electronic mail upon counsel of record in this proceeding.

s/ Maha M. Kabbash

Maha M. Kabbash, Esq.

Dated: May 21, 2025